

FILED 20 JAN '23 10:28 USDJ-ORP

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of OREGON

PORTLAND Division

EBRAHIM WAHAB

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SAIMA WAHAB

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

3:23-cv-98-SB

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	EBRAHIM WAHAB
Street Address	8702 SW 49 TH AVE
City and County	PORTLAND, MULTNOMAH
State and Zip Code	OREGON 97219
Telephone Number	503-481-5288
E-mail Address	emwahab@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	SAIMA WAHAB
Job or Title (<i>if known</i>)	UNKNOWN
Street Address	703 Burns St SE
City and County	WASHINGTON,
State and Zip Code	Washington, DC 20019-4914
Telephone Number	(503) 803-3692 (MAY NOT BE ACCURATE OR CURRENT)
E-mail Address (<i>if known</i>)	N/A

Defendant No. 2

Name	NONE
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	NONE
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	NONE
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

E-mail Address *(if known)* _____**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Publication of defamatory and false statements by the defendant alleging criminal conduct by the plaintiff.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* EBRAHIM WAHAB, is a citizen of the State of *(name)* OREGON.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) SAIMA WAHAB, is a citizen of
 the State of (name) DISTRICT OF COLUMBIA. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
 the laws of the State of (name) _____, and has its
 principal place of business in the State of (name) _____.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Action 1. Defendant, Saima Wahab committed a libelous act of publishing defamatory, extremely damaging, slandering text wrongfully accusing plaintiff of criminal acts.

Action 2. Defendant acted with malicious intension, knowing that her allegations are false and unsubstantiated.

For both actions 1 and 2 above, the Plaintiff seeks:

1. Full retraction of the text message sent on May 8th, 2022 to all original recipients. Retraction must include a full apology to the plaintiff as well as ALL other recipients of the text message.

2. Plaintiff seeks \$600,000.00 in liable monetary damages from defendant, Saima Wahab. Plaintiff seek this amount for:

a. Cause of angst, physical and mental pain, creating anxiety, resurfacing symptoms of PTSD directly related to the aftermath of her slandering remarks. Amount exact: \$500,000.00

b. Causing distrust amongst family members and plaintiff, spreading false rumors, and distributing false allegations. Amount exact: \$50,000.00

c. Loss of work, livelihood, and earnings due to loss severe mental health issues resulting from defendant's allegations. Amount exact: \$50,000.00.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The Defendant, Saima Wahab is my niece. On May 8th, 2022, in a family gathering at a family member's home, she scripted the text message which I have attached a printed copy of her message with this filed Complaint as Evidence-1.

She has repeatedly labeled me as a pedophile, child molester, rapist, and the most horrible man one could have around children based on her accusation that she believes. These charges are all false and so removed from any facts. I have not ever committed such acts in my entire life to her or to anyone, ever. I ask the fair court of USA to ask her to come forward and prove her allegations or take back this most damaging, horrible allegation against an innocent man. I swear to God that I have never harmed or hurt her in any manner. Her letter has permanently damaged the fabric of a happy family with her letter. She wrote this letter in anger and because she did not want to see me in my nephew's house when she showed up that evening.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. Unless proven correct, Saima Wahab must retract her accusations including all the false statements against my brothers Amin and Zaher Wahab and I. It must include an apology to all the family members, friends, and I included who received or were made aware subsequently. For, Saima, in anger and spite hurt so many people emotionally.

2. She is liable for wrongly accusing me of crimes I have not committed. Plaintiff seeks \$600,000 in punitive damages from Saima Wahab for causing me mental illness, loss of livelihood, loss of work, loss of family, physical pain brought by the notion of being falsely accused, worsening my symptoms of depression.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/19/2023

Signature of Plaintiff

Printed Name of Plaintiff


EBRAHIM WAHAB

To:

The United States District Court

District of Oregon

Portland Division

From:

Ebrahim Wahab

8702 SW 49th Ave

Portland, OR 97219

Re: Complaint of a civil case of Plaintiff Ebrahim Wahab vs. Defendant Saima Wahab.

The subject of this complaint is to reject the writing and distribution of a set of extremely defamatory, inflammatory, and malicious text messages. It is regarding the text message that Saima Wahab sent to a group of people within and without the Wahab family on May 8, 2022. Saima published after an encounter in the house of my nephew, Aziz Wahab and his family in Portland, Oregon.

It was sent using the "Viber" Social Media phone app and is attached as **Annex A** herein. I am presenting it as an evidence complaint. The message was rather long, resembling a memo, and/or a warning to the recipients to be alert about the threat of an imminent danger amongst them. Alas, many of these people and I have known each other for decades. And their children know me by the title "grandfather". The recipients have known me as an uncle, a father, an artist, a professional, an integral and trusted member of the extended family, and as a gentle soul who has never hurt in any way neither his own, nor their children in his entire life.

The text message that Saima alleged and disseminated on May 8, 2022 was a complete surprise to all of us and sent a shock wave to everyone who received it and to others who later found out about its content. The message is entirely false and her accusations of me being a pedophile and a child molester are absolutely fictitious, accusatory, extremely defamatory, and severely damaging to every one of the recipients, especially me. We are astonished, confused, and bewildered, and our extended family ruptured deeply.

The defendant sent the text message alleging wrong doing to the following people:

- Akmal Wahab and spouse, Shazia
- Ajmal and spouse, Zarpana Wahab
- Jamila Wahab and spouse John
- Emal and spouse Shabana Wahab
- Aziz and spouse Karima Wahab
- Khalid Wahab and spouse (no name)
- Najiba and her spouse
- Zubaida Ehsan and her spouse, Ehsan.

Annex A:

The following is the content (screen shot) of the text message as forwarded to me by my nephew, Emal Wahab. He is one of the recipients.

3:06



wahab pedophile alert >

Jamila, Kabir, Khalid, MuzWahab, Naj, Zarp...



Saima Wahab

Ibrahim is a pedophile. He molested me when I was a child in kabul for months. It started when my father was taken and it went on until the pedophile left Afghanistan. Last night seeing him hug Meena broke my heart. I feel that I have to stop hiding this truth. It's not my shame. It's his. My fight and fall out with Amin and Zahir were also a direct result of them choosing a child molester over me. When the pedophile came to live with us in garden home, I told Zahir and Amin what he had done to me as a child. I told them I couldn't live having him in my life, and they both picked their brother over me. It's a choice they made and their choice made me realize how weak Zahir and Amin are. I decided to go my separate ways, and I have not regretted my decision. I do know that both Zahir and Amin are sorry now but I can't forgive them for threatening to get the pedophile a lawyer to sue me if I went public about the abuse. Which is what Zahir had done in my final argument with him. I am not rehashing the past to get your sympathy or ask for



Type a message...



...



3:06

**wahab pedophile alert >**

Jamila, Kabir, Khalid, MuzWahab, Naj, Zarp...



I am not rehashing the past to get your sympathy or ask for understanding. I am only telling you all because now you have daughters and you have sons and I see you are giving a pedophile access to your children, not knowing what he's capable of. It's my obligation to warn you that your children are not safe around him. If you still choose to socialize with him, it's on you. I am telling you in clear language he is a child molester, and once a child molester, always a child molester. There is no need for anyone of you to message or respond to this message because I know some of you would be forced to finally pick a side which makes you uncomfortable but I am more concerned about your children. They need protection from the evil around them. But if you need to talk about this, like I said, it's not my shame. I will talk. It's the truth and if Zahir and Amin were half the men they think they are, they would've stood by me and right now Ibrahim would not be having dinner with your children. Only in Afghan family, a child molester would be protected to protect the family name. In any decent society,



Type a message...



3:06

**wahab pedophile alert >**

Jamila, Kabir, Khalid, MuzWahab, Naj, Zarp...



children are not safe around him. If you still choose to socialize with him, it's on you. I am telling you in clear language he is a child molester, and once a child molester, always a child molester. There is no need for anyone of you to message or respond to this message because I know some of you would be forced to finally pick a side which makes you uncomfortable but I am more concerned about your children. They need protection from the evil around them. But if you need to talk about this, like I said, it's not my shame. I will talk. It's the truth and if Zahir and Amin were half the men they think they are, they would've stood by me and right now Ibrahim would not be having dinner with your children. Only in Afghan family, a child molester would be protected to protect the family name. In any decent society, he would be forced to register as a pedophile, and would be jailed if he was seen hugging a child.

11:39 AM

May 8, 2022

Emal, Saima Wahab, Ehsen, Ajmal, Kareema, Shabana and Babes left

Type a message...



I, Ebrahim Wahab, hereby declare that I have never hurt Saima Wahab or any other child in that heinous manner which I am accused of in my entire life. I have never molested Saima. Her belated accusations are intentional fabrications and perhaps a product of her jealousy of seeing the warm and close relations I had with other family children. Saima always had difficulty relating to others and needed to be the center of attention. I believe that she wrote the accusatory text message out of anger, frustration, and spite to hurt someone she saw vulnerable. I also believe that she wanted and needed to divert attention from her own (and by her own written admission) scandalous and ill-reputed life. Furthermore, she wanted to create and deepen a wedge amongst the family members. Defendant's statements are too far from the truth that I am not going to explain. Instead, I would like to have the Justice of the court, a benign entity, to investigate this matter thoroughly and issue its judgement. I would like to speak to and ask the Court of the United States to ask the defendant, Saima Wahab, to present proof of accusing me repeatedly, maliciously, intentionally, and in a very hurtful way.

I believe that I am a victim of character assassination. Her message to her family and friends, has the title of "WAHAB pedophile alert". The first sentence starts by saying "Ibrahim [sic] is a pedophile." A pedophile is a criminal recognized by the Justice System of the United States. It is actually a crime recognized as the most hideous character traits worldwide. Justice systems worldwide put pedophiles in prisons and punish them accordingly. In her text message, Saima repeats the accusation in order to project me as the most dangerous person to have around the children of the recipients. I must reiterate that I am no stranger to the recipients or the children of the recipients. I have spent a great deal of time with them. They are all my relatives. They know me as an integral member of the extended family.

It must also be noted that I have two daughters of my own. I am a father, a brother, an uncle, a friend. Many, if not all of them, have known me their entire lives. Surely, at some point, somehow, somewhere, one of them would have suspected me acting inappropriately with their children, or anyone else. If she thinks that I was a pedophile and was getting away with it all my life, then, she is a fool!

I am a humble, modest, spiritual man and have lived here as a United States citizen for decades. I have a deep respect for law, morality, human dignity, right and wrong. I am a career artist, an honest to God person, and I am trying to leave just goodness behind. I only do my work and raise a family as best as I can while leading by a good example. It was very difficult to do that in my country of birth, Afghanistan due to severe social, economic, and political turmoil while our entire family lived there. I would like to state that neither in Afghanistan, nor here in the US, have I ever inappropriately treated Saima, or anyone else in my entire life. As a man of deep spiritual and religious beliefs, I deny categorically being called a "child molester", a "pedophile", an abuser of children or adults. No one else has ever called me one of these vile terms either before. If I had been such a heinous character, somehow the long arm of the law would have reached me.

The Defendant, Saima Wahab, has called me names that are untrue and far removed from the truth and reality. I, Ebrahim Wahab, respectfully ask the Justice of the United States, District of Oregon, Portland, to ask the defendant to come forward with the evidence she must possess if she speaks with such strong conviction.

The Defendant must explain and prove to the Justice of the United States how she came to the conclusion that I am a pedophile. Else, I respectfully ask the Justice of the Court to order her to take back her accusation, apologize, pay just compensation, and be held morally and legally liable in order to stop the damage that is being done to me and our family.

The recipients, regardless of who they might have been, did not need to know a lie about me in order to satisfy the defendant. I, therefore, ask the Justice of the United States to ask the defendant to present her case in front of the Judge and the Jury.

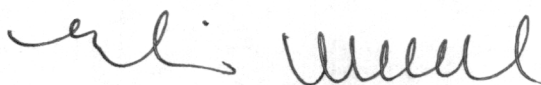
The first time I read the text message myself, I was shocked at the audacity of Saima to disavow, denigrate, and disrespect my brothers Zaher and Amin and I repeatedly since we saved her life and are responsible for getting to where she is. Her petty jealousy was evident and she seemed eager to convince the reader by adding phrases such as "...I see you are giving a pedophile access to your children, not knowing what he is capable of...." That is not true: all the recipients of her text message know me well and have appeared to trust me all my life.

The defendant, Saima Wahab states self-righteously in her text message that "I am telling you in clear language he is a child molester, and once a child molester, always a child molester."

I, the accused, ask the defendant to present the evidence that proves that I am an "always-child molester". For, the path I have taken in life so far has been anything but that. Her baseless accusations have destroyed my life and mental health; I am desperately depressed, anxious, angry, sad, and utterly stressed. Her false accusations to cause doubt amongst the mothers and fathers was vile and hateful and done on purpose to do so which have been the worst and most damaging to my mental health, position in the family, and to my social life. I am unable to hold work because of the resurgence of my life long PTSD. Her accusations brought back horrendous memories of war, violence, death, and destruction that I encountered in Afghanistan during the 1980's. That is a part of my file that resembles a deep pit I am always so desperately trying to climb out of. The defendant's accusations were so damaging because they relodged me inside that deep pit.

I respectfully beg the Justice of the United States to settle this matter between us so that justice will prevail and we can resume normal lives.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Ebrahim Wahab'.

Ebrahim Wahab, Plaintiff.

Jan. 19, 2023